

1 UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
3 ASHEVILLE DIVISION  
4 No. 1:17 cv 00129; 1:17 cv 00256

5 RICHARD L. CAMPBELL,  
6 Plaintiff,  
7 vs.  
8 SHIRLEY TETER and SINCLAIR  
9 COMMUNICATIONS, LLC,  
10 Defendants.

11 SHIRLEY TETER,  
12 Plaintiff,  
13 vs.  
14 PROJECT VERITAS ACTION FUND,  
15 PROJECT VERITAS, and JAMES  
16 E. O'KEEFE, III,  
17 Defendants.

18 Videotaped Deposition of CHRISTIAN LEE  
19 HARTSOCK, at 12400 Wilshire Boulevard, Suite 700,  
20 Los Angeles, California, beginning at 10:28 a.m.,  
21 and ending at 5:27 p.m. on Thursday, November 15,  
22 2018, before MICHELE URBINA, Certified Shorthand  
23 Reporter No. 9635.  
24  
25

## 1 APPEARANCES:

2 For Plaintiff Shirley Teter:

ELLIS &amp; WINTERS, LLC

3 BY: JONATHAN D. SASSER, ESQUIRE

PREETHA SURESH RINI (Via Speakerphone)

4 Attorneys at Law

4131 Parklake Avenue, Suite 400

5 Raleigh, North Carolina 27612

(919) 865-7002

6 jon.sasser@elliswinters.com

7  
8 For Defendants Project Veritas Action Fund, Project  
Veritas, James E. O'Keefe, and The Deponent:

9 WOMBLE BOND DICKINSON (US) LLP

BY: JAMES A. DEAN, ESQUIRE

10 MICHAEL MONTECALVO (Via Speakerphone)

Attorneys at Law

11 One West Fourth Street

Winston-Salem, North Carolina 27101

12 (336) 721-3770

jamie.dean@wbd-us.com

13 michael.montecalvo@wbd-us.com

14  
15 For Plaintiff Richard L. Campbell:

CRANFILL SUMNER &amp; HARTZOG LLP

16 BY: TODD A. KING, ESQUIRE

Attorney at Law

17 2907 Providence Road, Suite 200

Charlotte, North Carolina 28211

18 (704) 940-3417

tak@cshlaw.com

19 (Appearance Via Speakerphone)

20  
21 Videographer:

22 CASEY HOWELL

1     **for.**

2           Q     Were there any that month?

3           A     **Not that I recall.**

4           Q     You sure there wasn't one that month?

5           A     **I don't -- not that I -- none that I was**  
6     **referring to on the 15th.**

7           Q     Was there one that Mr. Foval could have been  
8     referring to in the past month?

9           A     **I would be very surprised. It was very**  
10    **clear we were talking about that. There was no**  
11    **suspicion that we did not know what was being referred**  
12    **to.**

13                   I mean, it was -- it was a hot headline that  
14    week. The day before -- the day -- I believe the day  
15    before that, it was brought to my attention the day --  
16    on the -- I believe on the 14th it was brought to my  
17    attention when I was already there in Wisconsin.

18           Q     How did you learn about it?

19           A     **Joel Pollak sent me a link to it and said --**  
20    **and had asked if I thought maybe this was one of**  
21    **Foval's plants.**

22           Q     Mr. Foval -- as far as -- sorry.

23                   Mr. Pollak was very interested in the Foval  
24    investigation; wasn't he?

25           A     **Yes.**

1           Then it says, "Richard Campbell, 73, was  
2       accused of sucker-punching 69-year-old Shirley Teter  
3       who wears an oxygen tank."

4           Is this the first time that word "Shirley  
5       Teter" appear at Veritas?

6           **A       Could you clarify the question?**

7           **What do you mean by showed up at Veritas?**

8           Q       It shows up in any of Veritas' records, is  
9       this the first time --

10          **A       I don't know.**

11          Q       Had you seen her name in any e-mail at  
12       Veritas prior to October 14, 2016?

13          **A       I don't know.**

14          Q       Do you recall seeing it before October 14,  
15       2016?

16               MR. DEAN:  Objection.  Object to form.

17               **THE WITNESS:  That's what I mean by I don't**  
18       **know.**

19               **I don't -- I know for a fact that her name**  
20       **was in the article that Joel had either e-mailed or**  
21       **texted me, somehow communicated to me on the 14th, I**  
22       **believe, 13th or 14th.**

23       BY MR. SASSER:

24          Q       Of September?

25          **A       Yeah.**

1 Q The previous month?

2 A Yeah.

3 Right before I met with Scott to ask him.

4 Q That was the project -- I'm sorry.

5 That was the Breitbart story that mentioned  
6 Mrs. Teter; right?

7 A I believe it -- I don't -- I don't recall  
8 the source of the story. I recall that it was a  
9 story --

10 Q Okay.

11 A -- that -- about Shirley Teter that Joel had  
12 briefed me on.

13 Q All right. The third paragraph from the  
14 bottom says, "Foval nods when asked if Democracy  
15 Partners is responsible for the incident outside of  
16 the rally in North Carolina, who he has -- his group  
17 did not have direct contact with Teter. We didn't  
18 know who she was ahead of time, Foval says. We just  
19 had somebody connected with her before that rally and  
20 we knew she was putting herself out there -- that's  
21 all we knew."

22 That's consistent with the AAR that you  
23 prepared; right?

24 A Yes.

25 Q Although your AAR did not mention the word

1                   And when I have cable, I tend to have CNN  
2 on.

3           Q     Do you read Breitbart?

4           A     Not -- not routinely. I mean, I've -- when  
5 there's a link to a Breitbart piece, when I'm directed  
6 to Breitbart, I tend to -- I will read it.

7           Q     Did Donald Trump donate to Project  
8 Veritas?

9           A     My -- as I recall, he gave a small donation  
10 in 2014.

11          Q     How much?

12          A     I don't know exactly. I saw from, at least  
13 one source, that it was \$10,000.

14          Q     Was that personally or from his campaign?

15          A     There was no campaign, as far as I knew. I  
16 mean, he was Donald Trump. There was -- as I  
17 understood, there was no campaign until June of  
18 2015.

19          Q     Mr. Pollak specifically sent you a story on  
20 September 14 about Shirley Teter?

21          A     I don't recall the exact date, but it was  
22 certainly around that time. It was -- I -- quite  
23 probably on the 14th, because I remember I was in the  
24 hotel room when -- when I received that from him  
25 and.

1 Q Do you know whether that was a Breitbart  
2 story or not?

3 A I don't recall. I recall that there was  
4 a -- if I recall correctly, it was a local story --  
5 either a local story or an article hyperlinking a  
6 local story. I don't recall exactly.

7 But I do know that it was a mainstream story  
8 that was making headlines in the mainstream.

9 And by "mainstream," I do not mean  
10 Breitbart.

11 THE REPORTER: 15.

12 MR. SASSER: Let's mark as next exhibit,  
13 PVDEF 11651.

14 (Plaintiff's Exhibit 15 was marked for  
15 identification by the court reporter.)

16 BY MR. SASSER:

17 Q What is that?

18 A I don't know. It looks -- I don't know.

19 Q Are those Slack conversations?

20 A I don't know.

21 Yes, I believe this is Slack, yes.

22 Q Are you a participant in any of those  
23 conversations?

24 A I don't know. Let me see.

25 Q There's discussion there of this video about

1  
2 I, the undersigned, a Certified Shorthand  
3 Reporter of the State of California, do hereby  
4 certify:

5 That the foregoing proceedings were taken  
6 before me at the time and place herein set forth; that  
7 any witnesses in the foregoing proceedings, prior to  
8 testifying, were placed under oath; that a verbatim  
9 record of the proceedings was made by me using machine  
10 shorthand which was thereafter transcribed under my  
11 direction; further, that the foregoing is an accurate  
12 transcription thereof.

13 I further certify that I am neither  
14 financially interested in the action nor a relative or  
15 employee of any attorney of any of the parties.

16 IN WITNESS WHEREOF, I have this date  
17 subscribed my name.

18 *Michele Urbina*

19 \_\_\_\_\_  
20 MICHELE URBINA

21 CSR NO. 9635  
22  
23  
24  
25